

David C. Parisi (SBN 162248)
Suzanne Havens Beckman (SBN 188814)
Parisi & Havens LLP
15233 Valleyheart Drive
Sherman Oaks, CA 91403
(818) 990-1299
dparisi@parisihavens.com
shavens@parisihavens.com

Counsel for Plaintiff Kevin Ranger,

Camilo Echavarria (SBN 192481)
Davis Wright Tremaine LLP
865 S. Figueroa Street, Suite 2400
Los Angeles, California 90017-2566
(213) 633-6800
camiloechavarria@dwt.com

James C. Grant [Pro Hac Vice]
Cassandra L. Kinhead [Pro Hac Vice]
Davis Wright Tremaine, LLP
1201 Third Avenue, Suite 2200
Seattle, Washington 98101-3045
(206) 622-3150
jimgrant@dwt.com
cassikinhead@dwt.com

Counsel for Defendant T-Mobile USA, Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION

KEVIN RANGER, on their own behalf
and on behalf of all others similarly
situated,

Plaintiff,

v.

T-MOBILE USA, INC., a Delaware
corporation,

Defendant.

Case. No.: ED CV 08-01518 VAP
(JCx)

JOINT STIPULATION TO
CONTINUE BRIEFING AND
DISCOVERY DEADLINES AND
HEARING ON CLASS
CERTIFICATION

The Hon. Virginia A. Phillips

STIPULATION

THE PARTIES, by and through their counsel, being in agreement, hereby stipulate as follows:

1. On May 4, 2009, this Court entered an Order setting discovery and briefing schedules for class certification. (Dkt. No. 29.) Among other deadlines, the Order set a discovery cut-off of August 14, 2009, for class certification-related discovery, and set Wednesday, November 11, 2009, as the date for hearing the motion for class certification.

2. Plaintiff and Defendant need additional time to complete discovery.

3. Furthermore, discussions regarding potential settlements involving other actions and related parties – including aggregators and content providers – may significantly impact the claims alleged in the instant lawsuit. The parties could therefore further benefit from additional time for the purpose of facilitating settlement discussions.

4. The May 4, 2009, Order also set the hearing on Class Certification for Wednesday November 11, 2009, which is the Veteran's Day holiday.

5. The parties believe there is good cause for the continuance of the schedule for plaintiffs' class certification motion and associated pre-hearing deadlines, as set forth herein. The parties further believe that this request is consistent with Local Rule 16-15, which encourages disposition of civil litigation by settlement.

///

///

///

///

///

///

6. The parties believe that the case deadlines should be set out an additional 45 days, as follows:

	Existing Deadline	Proposed Deadline
Initial expert designation for class certification	Aug. 7, 2009	Sept. 24, 2009
Rebuttal expert designation for class certification	Aug. 21, 2009	Oct. 8, 2009
Discovery Cut-off	Aug. 14, 2009	Oct. 1, 2009
Plaintiff's Motion for Class Certification	Sept. 11, 2009	Oct. 29, 2009
Defendant's Opposition to Class Certification	Oct. 9, 2009	Nov. 26, 2009
Plaintiff's Reply on Class Certification	Oct. 23, 2009	Dec. 10, 2009
Hearing on Motion for Class Certification	Nov. 11, 2009	Jan. 6, 2010

IT IS HERBY STIPULATED AND AGREED:

Dated this 14th day of July, 2009

By: s/ David C. Parisi
 DAVID C. PARISI
 Parisi & Havens LLP
 Attorneys for Kevin Ranger, on his
 own behalf and on behalf of all
 those similarly situated

By: s/ Camilo Echavarria
 Camilo Echavarria
 James C. Grant (pro hac vice)
 Cassandra Kinhead (pro hac vice)
 Davis Wright Tremaine LLP
 Attorneys for T-Mobile USA, Inc.